

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JORDAN'S LADDER LEGAL PLACEMENTS, LLC,

Plaintiff,

-against-

MAJOR, LINDSEY & AFRICA, LLC,

Defendant.

No. 21 Civ. 7124

**NOTICE OF MOTION TO DISMISS PLAINTIFF'S COMPLAINT
IN LIEU OF ANSWER PURSUANT TO F.R.C.P. 12(b)(6)**

PLEASE TAKE NOTICE that, upon the annexed affirmation of William E. Vita, Esq., dated October 26, 2021, and exhibits thereto, and the accompanying Memorandum of Law and upon all pleadings had herein, defendant MAJOR, LINDSEY & AFRICA, LLC ("MLA") will move this Court, pursuant to F.R.C.P. 12(b)(6), before the Honorable Colleen McMahon, at the Courthouse located at 500 Pearl Street, Courtroom 24A, New York, New York 10007, for an Order pursuant to Federal Rule of Civil Procedure 12(b)(6), dismissing the Complaint as against MLA, with prejudice, and granting all other relief deemed just and proper.

PLEASE TAKE FURTHER NOTICE, that, pursuant to the Honorable Colleen McMahon's Individual Rules Section V. F. answering papers or motions are to be served fourteen days after receipt of the moving papers, and, Reply papers, if any, are to be served five days later.

Dated: New York, New York
October 26, 2021

SHOOK, HARDY & BACON, LLP



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